

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RUTH V. BRIGGS

Plaintiff,

v.

TEMPLE UNIVERSITY

Defendant.

Civil Action No.

16-0248

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Ruth V. Briggs (“Plaintiff”) and Defendant Temple University – of the Commonwealth System of Higher Education (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, jointly move this Court for an extension of all deadlines established in the Court’s Scheduling Order of January 13, 2017 (Doc. No. 17). The Parties respectfully request that the following new deadlines be established, due to Defendant’s recently retaining new undersigned counsel and counsel’s scheduling conflicts in February 2017.

1. All factual discovery shall be completed on or before May 15, 2017;
2. All dispositive motions, if any, shall be filed on or before June 16, 2017; and
3. If the parties do not file any dispositive motions, the parties’ Joint Pretrial Order shall be filed on or before August 1, 2017. If dispositive motions are filed, the parties’ Joint Pretrial Order shall be filed within fourteen (14) days after the Court’s disposition of the dispositive motions.

The Parties seek the relief requested in this motion for the following reasons:

1. Defendant's counsel, Rachel Fendell Satinsky, represents she is scheduled to commence a trial in the District Court for the District of New Jersey in the matter of *Wallace v. Mission Solutions, LLC et al.* (Civil Action No. 14-4362) beginning on February 6, 2017.
2. Defendant's counsel, Richard Harris, represents that he has extensive out-of-state, pre-planned business travel throughout the month of February.
3. Defendant's counsel further represents that Defendant only recently retained their services and they still are awaiting the transfer of Defendant's former counsel's files.
4. Before undersigned counsel for Defendants was retained, the Parties had exchanged initial discovery, and negotiated and agreed upon search terms for electronically stored information ("ESI"). Defendant's undersigned counsel is becoming familiar with Defendant's and Plaintiff's document production and is committed to finishing discovery quickly and efficiently.
5. To date, the Parties have taken no depositions, although Defendant anticipates deposing Plaintiff and Plaintiff anticipates deposing at least seven (7) witnesses.
6. Plaintiff's counsel authorized Defendant's counsel to submit this motion as an uncontested joint motion and to file this joint motion on behalf of the Parties.

Therefore, Plaintiff and Defendant respectfully request that the Court grant this motion and extend the deadlines set forth in this Court's Order of January 13, 2017 to the new dates specified herein and to enter the proposed order.

s/ Rahul Munshi

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*Attorneys for Plaintiff
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Dated: February 2, 2017

/s/ Rachel Fendell Satinsky

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CERTIFICATE OF SERVICE

I, Rachel Fendell Satinsky, hereby certify that on this 2nd day of February, 2017, the foregoing document was filed using the Eastern District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon all counsel of record.

/s/ Rachel Fendell Satinsky

Rachel Fendell Satinsky

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ORDER

AND NOW, this _____ day of _____ 2017, upon joint motion of Plaintiff Ruth V. Briggs (“Plaintiff”) and Defendant Temple University – of the Commonwealth System of Higher Education (“Defendant”) for an extension of time, it is hereby **ORDERED** that the motion is **GRANTED** and the deadlines set by this Court’s Scheduling Order of January 13, 2017 (Doc. No. 17) are modified as follows:

1. All factual discovery shall be completed on or before May 15, 2017;
2. All dispositive motions, if any, shall be filed on or before June 16, 2017;
3. If the parties do not file any dispositive motions, the parties’ Joint Pretrial Order shall be filed on or before August 1, 2017. If dispositive motions are filed, the parties’ Joint Pretrial Order shall be filed within fourteen (14) days after the Court’s disposition of the dispositive motions;
4. The Court shall give this case a date certain for trial; and

5. Proposed changes to the foregoing schedule shall be considered by written motion only.

BY THE COURT:

ROBERT F. KELLY
SENIOR JUDGE